

UNITED STATES DISTRICT COURT  
MIDDLE DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA : NO. 3:18-CR-97  
:   
v. : (Mariani, J.)  
:   
ROSS ROGGIO, : (electronically filed)  
Defendant :

**SECOND UNOPPOSED MOTION FOR ENLARGEMENT OF TIME  
TO RESPOND TO DEFENDANT'S PRETRIAL MOTION**

AND NOW, the United States of America, by its undersigned counsel, submits the following Motion for Enlargement of Time to File its response to Defendant's Pretrial Motion. In support of this motion the United States alleges as follows:

1. On October 11, 2019, Gino Bartolai, counsel for defendant Ross Roggio, filed a suppression motion (Doc. 65).
2. The United States' response to that motion is due on August 6, 2020.
2. Counsel for the government was subject to significant time constraints arising from other briefing deadlines and tele-working constraints due to COVID-19 that prevented preparation and filing of a brief on or before August 6, 2020.
3. The undersigned respectfully requests an extension of time

to respond to the pretrial motion.

4. It is respectfully submitted that the ends of justice will be served by an extension of time to respond to Roggio's pretrial motion, for a period of 30 days, and excluding from the Speedy Trial clock that associated period of delay. The reasons for this adjournment outweigh the interest of the public and the defendant in a speedy trial.

5. Counsel for the defendant concurs in this motion.

WHEREFORE, for the foregoing reasons, the Government respectfully requests that the Court grant the Motion for Enlargement of Time to File its response to the Defendant's Pretrial Motion and to exclude the associated period of delay from the speedy trial calculation.

Respectfully submitted,

/s/ Todd K. Hinkley  
TODD K. HINKLEY

Dated: August 10, 2020

Assistant United States Attorney  
235 N. Washington Ave., Suite 311  
Scranton, PA 18503  
(570) 348-2800 (telephone)

**CERTIFICATE OF CONCURRENCE/NONCONCURRENCE**

I, Todd K. Hinkley, Assistant United States Attorney, have contacted Gino Bartolai, Esquire, counsel for defendant Ross Roggio, who concurs in the filing of this motion.

/s/ Todd K. Hinkley

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TODD K. HINKLEY  
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**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that on this 10<sup>th</sup> day of August, 2020, I caused the foregoing Motion to be filed and that attorney Gino Bartolai, Esquire, is a filing user under the ECF system. Upon the electronic filing of a pleading or other document, the ECF system will automatically generate and send a Notice of Electronic Filing to all filing users associated with this case. Electronic service by the Court of the Notice of Electronic Filing constitutes service of the filed document and no additional service upon the filing user is required.

/s/ Katherine Sanchez  
KATHERINE SANCHEZ  
Legal Assistant